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Department of the Interior
Minerals Management Service (MS 4024)
Attn: Rules Processing Team (Comments)
381 Elden Street
Herndon, VA 20170-4817

Re: RIN 1010-AD 11; Sub Part J-Pipelines and Pipeline Rights-of-Way
FR Vol. 72, No. 191 10-03-07

Ladies and Gentlemen:

API appreciates this opportunity to provide written comments on the proposed rule to amend regulations for pipelines and pipeline rights-of-way, as provided in the October 3, 2007 Federal Register Notice. We also want to thank you for conducting the workshop on February 22, 2008, and extending the comment period to March 17, 2008.

API is a trade association representing nearly 400 member companies involved in all aspects of the oil and natural gas industry. A number of our members conduct oil and natural gas production and pipeline-related activities offshore and are impacted by this rulemaking.

Although API commends the efforts of MMS to rewrite 30 CFR Subpart J to use plain language and to restructure the rule to clarify current regulations, there are several concerns that can potentially have a significant impact to offshore oil and natural gas development without improving safety, efficiency or environmental performance.

Additionally, based on industry's review of the proposed rule, MMS has significantly understated the cost impacts to industry. We feel strongly that this is a major rulemaking, yet provides minimal benefits. The proposed streamlined rule actually lengthens the permitting approval process, creates prescriptive reporting, inspection and record keeping requirements, and creates numerous duplications and conflicts with existing Department of Transportation (DOT) requirements. The agency provided no information in the proposed rulemaking that would justify the need for this approach.

API recommends that the MMS work jointly with DOT and industry in developing performance-based, comprehensive regulations where regulations are needed to improve safety, reliability and environmental performance.



API has worked jointly with the Offshore Operators Committee (OOC) in developing detailed comments on this proposed rulemaking. We strongly support the recommendations submitted by OOC and encourage the agency to fully consider these recommendations.

Sincerely,

Tim Sampson
API